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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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In re: Chapter 11

NATIONAL REALTY INVESTMENT Case No. 22-14539(JKS)
ADVISORS, LLC,

Debtor

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**OPPOSITION OF JEAN-MICHEL APPOLON
ON BEHALF OF AVEMM CORPORATION TO THE
MOTION OF THE DEBTOR SEEKING DISMISSAL OF
BLACK HORSE ALLEY CAPITAL LLC**

Jean-Michel Appolon, by and through his attorneys, Kurtzman Matera P.C., submits this Opposition (“Opposition”) to the Motion (“Motion”) of National Realty Investment Advisors, LLC (“Debtor”) For Entry of An Order Dismissing the Chapter 11 Case of Black Horse Alley Capital LLC (“Black Horse”) and respectfully sets forth a follow:

1. The Debtor seeks a dismissal of Black Horse pursuant to Section 1112(b)(1) of the United States Bankruptcy Code.
2. Section 1112(b)(1) allows a court to dismiss a Chapter 11 case for cause on request of a party in interest and after notice and a hearing.

3. The Motion, without documentation, affidavit or certification presents no cause. The only offering is a statement that, without conviction, suggests there “may” be an argument “that the filing was not appropriate”. Motion at paragraph 8.

4. In addition to the absence of documentation, neither this Court nor creditors are presented an analysis of what asset or causes of action are potentially in Black Horse for the benefit of the Debtor’s estate.

5. In sum, without the ability to review the corporate documents referenced in paragraph 8 of the Motion, and a presentation of potential benefit to creditors of the Debtor, the Motion is woefully inadequate and should be denied in its entirety.

WHEREFORE, it is respectfully requested that this Court deny the Motion and grant such other and further relief as is just and proper.

Dated: Chestnut Ridge, New York
July 12, 2022

Kurtzman Matera, P.C.
Attorneys for Jean-Michel Appolon, Creditor

/s/ Rosemarie E. Matera
Rosemarie E. Matera, Esq.